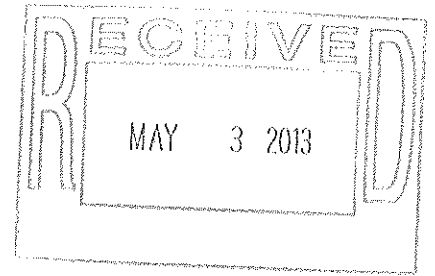


Exhibit O



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT



May 1, 2013

Jeff Edwards
The Edwards Law Firm
The Bremond Houston House
706 Guadalupe
Austin, Texas 78701

Scott Medlock
Texas Civil Rights Project
1405 Montopolis Drive
Austin, Texas 78741

Eliot Shavin
2600 State Street
Dallas, Texas 75204

Re: *Stephen McCollum, et al., v Brad Livingston, et al.*; Civil Action No. 312-CV-02037; USDC, Northern District - Dallas Division

Gentlemen:

Enclosed please find **Defendants' Brad Livingston, Jeff Pringle, and Texas Department of Criminal Justices Responses to Plaintiff Stephen McCollum's Fourth Set Request for Production** in the above-referenced cause.

Sincerely,

Trina L. Katz,
Legal Secretary to:
BRUCE R. GARCIA
Assistant Attorney General
Law Enforcement Defense Division
(512) 463-2080 / (512) 495-9139 Fa

/tlk
Enclosures

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

Stephanie McCollum, *et al.*,
Plaintiffs,

v.

Brad Livingston, *et al.*,
Defendants.

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§

Civil Action No. 3:12-CV-02037

JURY DEMAND

**DEFENDANTS' BRAD LIVINGSTON, JEFF PRINGLE, AND TEXAS
DEPARTMENT OF CRIMINAL JUSTICE RESPONSES TO PLAINTIFF
STEPHEN MCCOLLUM'S FOURTH SET OF
REQUEST FOR PRODUCTION**

TO: Jeff Edwards, The Edward Law Firm, The Bremond Houston House, 706 Guadalupe, Austin, Texas 78701; Scott Medlock, Brian McGiverin, James C. Harrington, Texas Civil Rights Project, 1405 Montopolis Drive, Austin, Texas 78741; and Eliot Shavin, 2600 State Street, Dallas, Texas 75204

COMES NOW the Defendant, Texas Department of Criminal Justice, by and through counsel, the Texas Attorney General's Office, and offers the following **Defendants' Brad Livingston, Jeff Pringle and Texas Department of Criminal Justice Responses to Plaintiff Stephen McCollum's Fourth Set of Request for Production.**

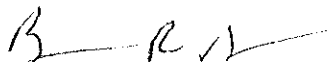
Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

DAVID C. MATTAX
Deputy Attorney General for Defense Litigation

KAREN D. MATLOCK
Assistant Attorney General
Chief, Law Enforcement Defense Division



BRUCE R. GARCIA

Assistant Attorney General

Attorney in Charge

State Bar No. 07631060

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(512) 463-2080 / Fax (512) 495-9139

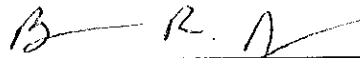
**ATTORNEYS FOR DEFENDANTS TEXAS
DEPARTMENT OF CRIMINAL JUSTICE,
BRAD LIVINGSTON AND JEFF PRINGLE**

CERTIFICATE OF SERVICE

I, **BRUCE R. GARCIA**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Defendants' Brad Livingston, Jeff Pringle, and Texas Department of Criminal Justice Responses to Plaintiff Stephen McCollum's Fourth Set of Requests for Production** has been served by placing same in the United States Mail, postage prepaid, on May 1, 2013 addressed to:

Jeff Edwards
The Edwards Law Firm
The Bremond Houston House
706 Guadalupe
Austin, Texas 78701

Scott Medlock
Texas Civil Rights Project
1405 Montopolis Drive
Austin, Texas 78741
Eliot Shavin
2600 State Street
Dallas, Texas 75204



BRUCE R. GARCIA

Assistant Attorney General

REQUEST FOR PRODUCTION

1. Please produce all Emergency Action Center Reports, Administrative Review and any OIG Investigations pertaining to the death of the following individuals.

- A. James Shriver (TDCJ # 390315) (D.O.D. August 8, 2007)
- B. Dionicia Robles (TDCJ # 1443175) (D.O.D. August 13, 2007)
- C. Kelly Marcus (TDCJ # 1128380) (D.O.D. August 12, 2011)
- D. Alexander Togonidze (TDCJ # 1578039) (D.O.D. August 8, 2011)
- E. Charles Cook (TDCJ # 1457456) (D.O.D. August 8, 2011)
- F. Michael Martone (TDCJ # 1395315) (D.O.D. August 8, 2011)
- G. Robert Webb (TDCJ # 1567961) (D.O.D. August 4, 2011)
- H. Thomas Meyers (TDCJ # 680515) (D.O.D. August 3, 2011)
- I. Kenneth Wayne James (TDCJ # 1726849) (D.O.D. August 13, 2011)
- J. Douglas Hudson (TDCJ # 1722504) (D.O.D. July 25, 2011)
- K. Daniel Alvarado (TDCJ # 1517660) (D.O.D. August 20, 2011)
- L. Rodney Adams (TDCJ # 179721) (D.O.D. August 3, 2012)

Response: Objection: over broad, undue burden, irrelevant, not calculated to lead to the discovery of admissible evidence and not reasonably limited in scope or time.

Defendant Pringle specifically objects to the request as he has no control over the documents requested by plaintiff, and cannot comply with the request.

Plaintiff seeks the discovery/production of numerous emergency action center documents relating to offender deaths occurring at different units and AFTER the death of Mr. McCollum on July 22, 2011. As a result defendants would object to the production of these documents as an undue burden upon them.